

Michael D. Greear
Wyoming Bar # 6-2776
Worrall & Greear, P.C.
P.O. Box 552
Worland, WY 82401
(307) 347-9801
(307) 347-2859
Attorneys for Defendants

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

| | | |
|--------------------------------------|---|----------------------|
| WELLS FARGO BANK. N.A., |) | |
| a national bank, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | Case No. 12-CV-221-J |
| |) | |
| NORTHERN ROCKIES NEURO- |) | |
| SPINE, P.C., a Wyoming corporation, |) | |
| JOHN H. SCHNEIDER, MICHELLE |) | |
| SCHNEIDER, SCHNEIDER LIMITED |) | |
| PARTNERSHIP, a Wyoming limited |) | |
| partnership, JOHN SCHNEIDER |) | |
| REVOCABLE TRUST U/A/D |) | |
| NOVEMBER 20, 2007, MICHELLE |) | |
| SCHNEIDER REVOCABLE TRUST |) | |
| U/A/D NOVEMBER 20, 2007, |) | |
| SCHNEIDER MANAGEMENT, LLC, |) | |
| a Wyoming limited liability company, |) | |
| |) | |
| Defendants. |) | |

MOTION TO AMEND ANSWER TO COMPLAINT

COME NOW Defendants, Northern Rockies Neuro-Spine, P.C., John H. Schneider, Michelle Schneider, Schneider Limited Partnership, John Schneider Revocable Trust U/A/D November 20, 2007, Michelle Schneider Revocable Trust U/A/D November 20, 2007, and Schneider Management, LLC, by and through undersigned counsel, and pursuant to Federal Rule of Civil Procedure 15(a)(1)(B) hereby amend their answer as a matter of course. Said answer is amended as a matter of course as it contains a counterclaim which requires a responsive pleading, and which is the subject of a Rule 12(b)(6) motion to dismiss filed by Plaintiff. The FIRST AMENDED ANSWER TO COMPLAINT is attached hereto as Exhibit A.

Pursuant to Local Rule 15.1, counsel for Defendants has conferred with counsel for Plaintiff. It was indicated to counsel for Defendants that he would be notified as to any objection after Plaintiff had sufficient time to review the proposed FIRST AMENDED ANSWER TO COMPLAINT and this motion. As such, Defendants will supplement this motion upon hearing from Plaintiff's counsel, and if there is no objection, Defendants will then provide the Court with a proposed order.

DATED this 3rd day of December, 2012.

WORRALL & GREAR, P.C.

By: /s/
Michael D. Greear, WSB #6-2776
P.O. Box 552
Worland, WY 82401
Voice: (307) 347-9801
Fax: (307) 347-2859
mgreear@rtconnect.net

By: /s/

David M. Clark, WSB #6-4133

P.O. Box 552

Worland, WY 82401

Voice: (307) 347-9801

Fax: (307) 347-2859

dc@rtconnect.net

Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on December 3, 2012, I filed the foregoing electronically through the CM/ECF system or by mailing a true and correct copy by United States mail, postage prepaid and addressed as follows:

James R. Belcher
Belcher & Boomgaarden LLP
237 Storey Boulevard, Ste. 110
Cheyenne, WY 82009

/s/

David M. Clark

EXHIBIT A

(First Amended Answer to Complaint)